## EXHIBIT B-2

## SHORT FORM NOTICE

#### **UNITED STATES DISTRICT COURT - DISTRICT OF MASSACHUSETTS**

# If You Are a Medicare Beneficiary and Made a Percentage Co-Payment for Zoladex® You May Be Able To Receive a Payment From A Proposed Class Action Settlement

There is a Proposed Class Action Settlement with AstraZeneca Pharmaceuticals LP ("AstraZeneca"), the maker of **Zoladex®**. Zoladex® is a drug used primarily in the treatment of prostate cancer. It is also used to treat advanced breast cancer, endometriosis and fibrosis. The class action lawsuit, *In re: Pharmaceutical Industry Average Wholesale Price Litigation*, Docket No. 01-CV-12257-PBS, MDL No. 1456, is pending in the U.S. District Court for the District of Massachusetts.

### What is the Class Action Lawsuit About?

The lawsuit claims that AstraZeneca reported false and inflated average wholesale prices ("AWPs") for Zoladex®. The lawsuit claims that these reported AWPs were used to set reimbursement amounts that were paid by Medicare and its beneficiaries. The lawsuit asks the Court to award money damages to those who were Medicare beneficiaries and made co-payments for Zoladex® as a result of the allegedly false AWPs for Zoladex®. AstraZeneca has asserted several factual and legal defenses to the class action lawsuit and denies any liability.

#### Who are Class Members?

You are a member of the Class if you made a percentage co-payment under Medicare Part B for Zoladex® (or are a spouse of a deceased class member or a legal representative of the deceased class member's estate who made such a co-payment) from January 1, 1991 through December 31, 2004. You do not need to do anything to become part of the Class, but you must complete the Claim Form in order to be able to receive money. Please note that if you excluded yourself from the Class in response to an earlier notice sent to you in this case, you may not participate in this Proposed Settlement.

## What Are the Terms of the Proposed Settlement?

AstraZeneca has agreed to pay up to \$24 million in the aggregate to settle the lawsuit. <u>In addition</u> to this amount, AstraZeneca has also agreed to pay notice and administration costs, attorneys' fees of \$6,500,000 and attorneys' costs of \$2,100,000, and additional awards to the two class representatives of \$5,000 each. The Court must approve the distribution of the Settlement and the amount of fees and costs to be paid to the attorneys for the Class.

If valid Class Member claims total less than \$24 million, the difference between the total claims and the \$24 million will be paid to charitable organizations funding cancer research or patient care, up to a maximum of \$10 million.

## Who Represents Me?

The Court has appointed attorneys to represent the Class. You may hire your own attorney, if you wish. However, you will be responsible for that attorney's fees and expenses.

## What Are My Legal Rights?

- If you wish to file a claim, you must complete a Claim Form. You can get a Claim Form by contacting the Claims Administrator in writing, at the address below, or by calling the toll-free number. It is also available on the AstraZeneca AWP Settlement Website. Claim Forms must be signed and postmarked no later than Month Date, 2007.
- If you are a resident of Alabama, Alaska, Georgia, Iowa, Kentucky, Louisiana, Mississippi, Montana or Virginia and do not wish to be a member of the Class, you have the right to opt out of this lawsuit. In order to opt out, you must submit a written request to be excluded as outlined in the *Notice of Proposed Class Action Settlement*. Your request must be postmarked no later than Month Date, 2007.
- •You can tell the Court if you do not like this Proposed Settlement or some part of it. To object or comment, you must send a letter that is mailed and postmarked no later than Month Date, 2007, as outlined in the *Notice of Proposed Class Action Settlement*.

#### Will the Court Approve the Proposed Settlement?

The Court will hold a Final Approval Hearing on \_\_\_\_\_ at \_\_\_\_ to consider whether the Proposed Settlement is fair, reasonable, and adequate and the motion for attorneys' fees and expenses. If comments or objections have been received, the Court will consider them at that time.

For a Notice of Proposed Class Action Settlement and a Claim Form

Call toll-free: 1 800-xxx-xxxx or Visit: www.xxxxxxxxx.com
Or Write: AstraZeneca AWP Litigation Administrator, c/o of Complete
Claim Solutions, P.O. Box 24654, West Palm Beach, FL 33416